

CRIMINAL COMPLAINT

(Electronically Submitted)

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| United States District Court | DISTRICT of ARIZONA |
| United States of America | DOCKET NO. |
| v. Jesus Jimenez-Martinez DOB: 1994; United States Janeth Rubio-Verdiales DOB: 1984; Mexico | MAGISTRATE'S CASE NO. 21-05991MJ |
| Complaint for violation of Title 8 United States Code § 1324(a)(1)(A) (ii), 1324(a)(1)(A)(v)(I), and 1324(a)(1)(B)(ii). | |

COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

COUNT 1 (Felony) On or about September 24, 2021, in the District of Arizona, **Jesus Jimenez-Martinez** and **Janeth Rubio-Verdiales**, named herein as defendants and conspirators, did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons, known and unknown, to transport certain illegal aliens, including Ivan Dominguez-Arias; in violation of **Title 8, United States Code, Sections 1324(a)(1)(A) (ii) and 1324(a)(1)(A)(v)(I)**.

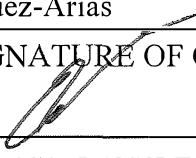
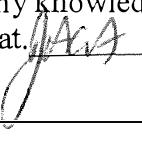
COUNT 2 (Felony) On or about September 24, 2021, in the District of Arizona, **Jesus Jimenez-Martinez** and **Janeth Rubio-Verdiales**, knowing and in reckless disregard of the fact that certain illegal aliens, including Ivan Dominguez-Arias, had come to, entered and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation and otherwise, in furtherance of such violation of law; in violation of **Title 8, United States Code, Sections 1324(a)(1)(A) (ii) and 1324(a)(1)(B)(ii)**.

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

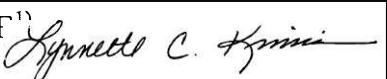
On or about September 24, 2021, in the District of Arizona (Sonoita), a United States Border Patrol Agent (BPA) observed a white colored Jeep Cherokee sport-utility vehicle (SUV), bearing Arizona license plates CVH5556, with multiple occupants. The passenger windows were tinted too dark to see through them. BPA followed the vehicle and a records check returned registered to a woman in Tucson, Arizona and a second female registered owner. BPA noticed the driver was a male subject. A crossing history of the Cherokee showed recent crossings by a male subject not related to the registered owners. BPA observed the Cherokee driving faster and passing numerous vehicles while BPA followed. The Cherokee activated a right turn signal to turn south on State Route 83 (SR 83), made an immediate turn into the Shell gas station on the corner of SR 82 and SR 83. The Cherokee pulled up to the fuel pumps and stopped. BPA conducted a vehicle stop on the Cherokee. The driver, later identified as **Jesus Jimenez-Martinez**, exited the Cherokee and approached the BPA vehicle. **Jimenez-Martinez** handed BPA an Arizona identification card and advised that he was born in Mexico but was a U.S. Citizen. The BPA approached the Cherokee and the front passenger, later identified as **Janeth Rubio-Verdiales**, claimed to be a U.S. Citizen. The BPA noticed two male passengers in the back seat. **Jimenez-Martinez** stated he just picked them up and did not know who they were. The two men admitted to the BPA that they were in the U.S. illegally, including Ivan Dominguez-Arias.

Material witness Ivan Dominguez-Arias said he had arranged to be smuggled into the United States for money. Dominguez-Arias said he crossed the U.S. border illegally and boarded an unidentified gray vehicle who transported him to an unknown location near the mountains. Dominguez-Arias said he was communicating with an unidentified individual stored in his contacts as "Vic." Dominguez-Arias said that he boarded a white SUV around 10:00 am on September 24, 2021 and was in the vehicle for about an hour. Dominguez-Arias stated that there was a male driver and a female passenger. Dominguez-Arias said that the vehicle was going to transport both undocumented migrants to Phoenix, Arizona. Dominguez-Arias positively identified the 2016 Jeep Cherokee SUV and the passenger, **Rubio-Verdiales** from a photo lineup.

MATERIAL WITNESS IN RELATION TO THE CHARGE: Ivan Dominguez-Arias

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| Detention Requested | SIGNATURE OF COMPLAINANT |
| Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge. |  |
| AUTHORIZED BY: AUSA JAA/kat.  | OFFICIAL TITLE Border Patrol Agent |

Sworn by telephone x

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| SIGNATURE OF MAGISTRATE JUDGE ¹⁾  | DATE September 27, 2021 |
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¹⁾ See Federal Rules of Criminal Procedure Rule 3, 4.1, and 54